

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JOHN DOE,	:	
	:	Civil Action No.
Plaintiff,	:	
v.	:	
	:	<u>COMPLAINT</u>
INTEL CORPORATION, ALAA BADR and	:	
ABDUL JARRAR,	:	
	:	<u>Jury Trial Demanded</u>
Defendants.	:	
-----	X	

JOHN DOE hereby alleges as follows:

PRELIMINARY STATEMENT

1. Intel Corporation’s (“Intel” or the “Company”) 2023 revenues were \$54.3 billion, and those revenues were driven heavily by the ongoing contributions that Israel, Israelis and Jewish people have made to Intel over the last 50 years, including the hard work and dedication of Intel’s 10,000+ Israeli employees.

2. Intel’s first employee, Andy Grove (“Grove”), hired in 1968, was a Jewish man who survived Nazi occupation and escaped Communist-controlled Hungary at the age of 20. In 1969, Intel hired Dov Frohman, Ph.D. (“Frohman”) – an Israeli-Jewish electrical engineer who lost his parents in the Holocaust and spent several years of his childhood in Jewish orphanages.

3. Intel would never have gotten off the ground, much less become the technology juggernaut that it is today, without the contributions of Grove and Frohman. And, in the 55 years since, Intel has relied significantly on the good graces of the Israeli government and its people to develop products, drive revenues and subsidize its business.

- In 1974, “Intel Israel” was founded in Haifa, Israel. Intel’s Haifa employees worked on products critical to Intel’s future, including key components of what would become the Pentium microprocessor

- In 1985, Intel opened a fabrication facility in Jerusalem, Israel, its first such factory outside of the United States.
- In 1996, Intel built a \$2.4 billion facility in Kiryat Gat, Israel.
- In 2005, Intel built a second facility in Kiryat Gat. Five years later, in 2010, Intel designed its first green building in Haifa, Israel.
- In 2017, Israel became home to Intel's Autonomous Driving Group, after the company acquired Mobileye, an Israel-based company that specialized in autonomous driving technology.
- Two years later, in 2019, Intel unveiled an 800,000 square-foot, 11-story development center in Petah Tikvah, Israel called PTK1.
- In 2021, Intel began building a new manufacturing center in Kiryat Gat, Israel at an estimated cost of \$10 billion. At the time, Pat Gelsinger ("Gelsinger"), Intel's Chief Executive Officer ("CEO"), said that Intel's continued investments in the country "promise a vibrant future for Intel and Israel for decades to come."
- In 2023, the aforementioned \$10 billion manufacturing center in Kiryat Gat, Israel began operating.
- Also in 2023, Intel announced its largest investment in Israel to date – a \$25 billion factory in Kiryat Gat, Israel. Toward the historic effort, the Israeli government agreed to provide Intel with a \$3.2 billion grant.

4. As of 2024, Intel employs more than 10,000 employees in Israel and thousands more Israelis and Jewish people across the globe. One of those Israeli employees is John Doe, a former member of the Israel Defense Forces ("IDF") who immigrated to the United States to expand the U.S. presence of an Israeli startup (the "Startup") that improved processor engines.

5. Shortly after John Doe arrived in New York City, the Startup was bought by Intel. At the time, John Doe was identified as one of the Startup's top 10 most important employees. As a result of his skills and talents, he was given a substantial retention bonus set to be paid out over time. His performance for Intel was outstanding, and he was promoted on multiple occasions, including as recently as January 2024.

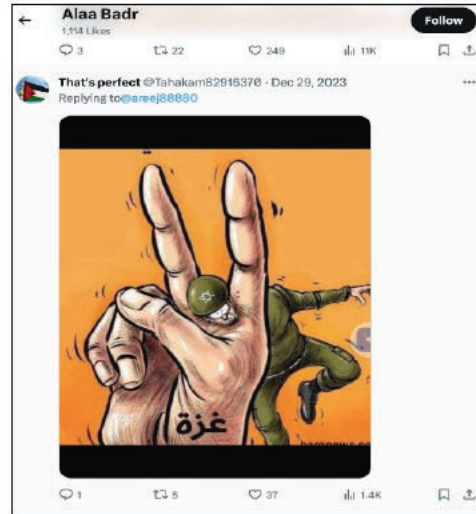
6. Given Intel's significant reliance on the Israeli people and economy, John Doe was not surprised when the Company purported to stand with Israel after Hamas, a terrorist group, unleashed an assault of startling brutality and breadth upon Israel on October 7, 2023.

7. Indeed, in supposed support for Israel, in November 2023, Intel provided its Israeli employees a \$5,000 wartime grant. In December 2023, Gelsinger stated: "For almost 50 years, we were the first company to start the tech nation there. I was just on the phone, yesterday, with Isaac Herzog, the president of the country. This is a resilient people. We will support them. We believe so deeply in what they've done."

8. Unfortunately, as it turned out, Gelsinger's words were nothing more than lip service for public relations purposes. Indeed, during the same time period in which Gelsinger was making these comments and Intel was claiming to support Israel, one of Intel's senior executives, Alaa Badr ("Badr") – Intel's Vice President of Customer Success – was openly celebrating Hamas, Qassam Brigade – the military arm of Hamas, the terroristic attacks on Israel and the death of Israeli citizens and soldiers.

9. Rather than keeping his views to himself, Badr splashed them across social media, retweeting and "liking" a number of anti-Israel and antisemitic postings, including posts cheering on the deaths of Israelis and IDF soldiers.

10. Many of these horrific and troubling postings are included herein, including the pictures below:



11. These pictures were obviously deeply offensive and upsetting to John Doe for a variety of reasons, including the fact that one of his close family members is an IDF soldier and, in the wake of the October 7, 2023 invasion, Hamas continued to fire missiles into Israel, one of which struck the home of John Doe's family, resulting in injuries to, and the displacement of his immediate family members.

12. Badr's offensive postings were known to senior Intel executives by late 2023, but nothing was done. Then on January 29, 2024, John Doe was reassigned to report directly to Badr.

13. It is impossible to overstate how disturbing this was for John Doe. He was reporting to, and forced to interact daily with, an individual whom he knew would celebrate the murder, and even the burning alive, of his immediate family members.

14. To make matters worse, Badr was not shy about his antisemitic views even with John Doe himself. For example, Badr repeatedly pressured John Doe to tell him whether other Intel employees were Israeli. When John Doe confirmed that specific employees were Israeli, Badr sneered that there were "so many Israeli employees in our company."

15. Upon learning that he would be required to report to Badr, John Doe immediately communicated with the former CEO (the "Former CEO") of the Startup he had previously worked at who was also hired by Intel in connection with the buyout, to express his distress. He told the Former CEO that given Badr's opinions about Israelis and the IDF specifically, he knew Badr would fire him as soon as he could.

16. The Former CEO agreed to file an official complaint on behalf of John Doe.

17. Initially, the Former CEO asked a Human Resources department personnel at Intel to file an official complaint against Badr. However, likely fearing retaliation given her own

status as an Israeli, she was hesitant to do so. As such, on February 4, 2024 the Former CEO filed the complaint himself through Intel's "EthicsPoint."

18. In the complaint, the Former CEO included a compilation of screenshots that showed Badr supporting Hamas and the murder of Israelis and Jews. He specifically stated that he was "report[ing] a concern with regards to an employee being hostile towards Israel and Israelis." In the complaint, the Former CEO also asked that Abdul Jarrar ("Jarrar"), the Vice President of Business Sales and Badr's manager, be notified about the complaint. Finally, it was obvious from the complaint, as well as a follow-up complaint in which the Former CEO shared the fact that John Doe's family had been injured and displaced in connection with a Hamas missile attack, that it was being made on John Doe's behalf.

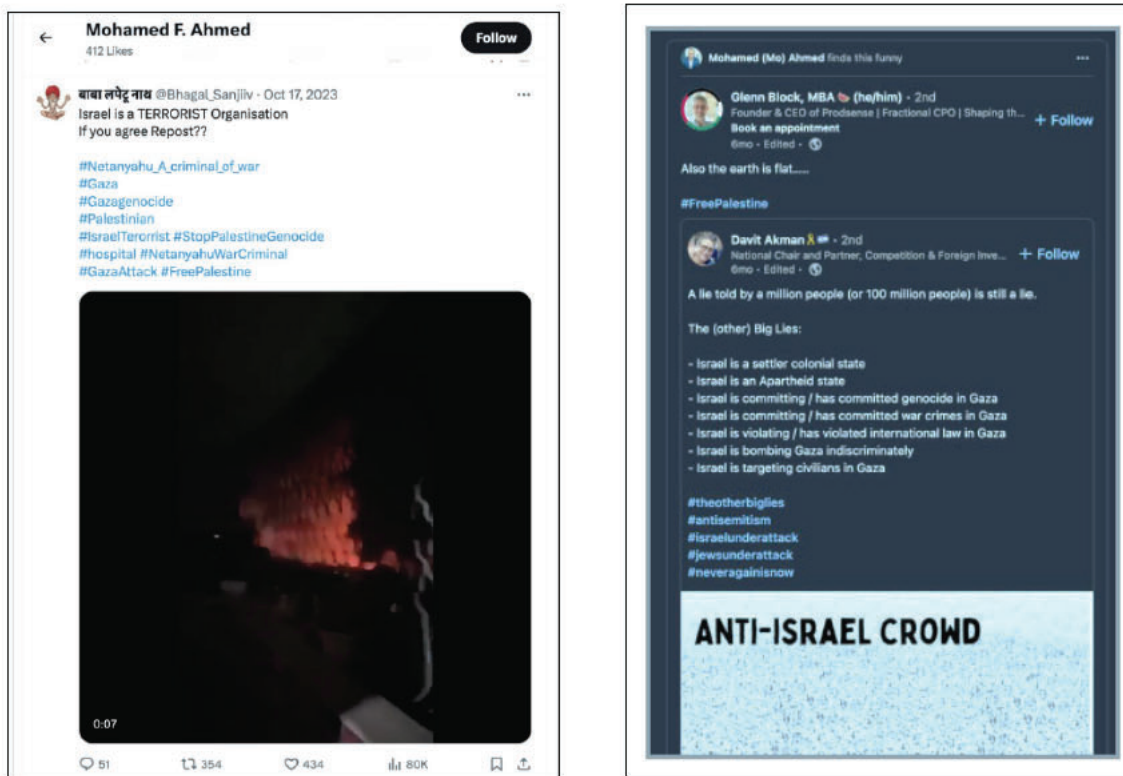
19. Incredibly, no remedial action was taken in response to the Former CEO's complaint and John Doe continued to report to a man who would like to see his family murdered. Intel did literally nothing to protect John Doe, which ultimately resulted in his discriminatory and retaliatory termination.

20. Indeed, shortly after the aforementioned follow-up complaint, in March 2024, Badr viewed John Doe's LinkedIn profile, which identifies John Doe as a former IDF soldier.

21. Just a few weeks later, on April 2, 2024, Jarrar informed John Doe that his employment was being terminated due to a purported need to cut costs. John Doe was the only one of Badr's reports that was terminated (and the only Israeli amongst Badr's direct reports).

22. The unlawful motives behind John Doe's termination could not have been more clear when, just weeks later, Badr and his supervisor, Jarrar, hired John Doe's replacement: Mohamed Ahmed ("Ahmed"). Incredibly, Ahmed openly espoused the same anti-Israel sentiments as Badr.

23. Like Badr, Ahmed has liked and reposted heinous terroristic and antisemitic materials, including, among others, the below postings:



24. Ahmed also openly called for the boycott of companies that supported Israel in the wake of Hamas' invasion.

25. By unlawfully terminating John Doe's employment and blessing Badr's horrific calls for the annihilation of Israelis, Intel turned its back not only on John Doe, but also on Israel, the Israeli people and government, and Jewish persons across the globe.

26. For these reasons, and all those set forth below, John Doe seeks all available monetary, equitable and/or injunctive relief for Defendants' violations of 42 U.S.C. § 1981 ("Section 1981"); New York City Human Rights Law, N.Y.C. Admin. Code §§ 8-101 *et seq.* ("NYCHRL"); and the New York State Human Rights Law, N.Y. Executive Law §§ 290 *et seq.* ("NYSHRL").

JURISDICTION AND VENUE

27. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1343 as this action involves federal questions regarding the deprivation of Plaintiff's rights under Section 1981.

28. Venue is proper in this district pursuant to 28 U.S.C. § 1391 because a substantial part of the events or omissions giving rise to this action, including the unlawful discrimination and retaliation alleged herein, occurred in this district.

29. Simultaneously with the filing of this Complaint, Plaintiff will file a Charge with the Equal Employment Opportunity Commission. When Plaintiff receives a Right to Sue, he will seek leave to amend this Complaint to add claims under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e *et seq.* ("Title VII").

PARTIES

30. John Doe is a resident of the State of New York. John Doe was and is an "employee" of Defendants under all applicable statutes.

31. Intel Corporation is a Delaware corporation that is headquartered in California. Intel was and is an "employer" of John Doe under all applicable statutes.

32. Alaa Badr is a resident of Washington. Badr was and is an "employer" of John Doe, and/or an "aider" and/or "abettor," under all applicable statutes.

33. Abdul Jarrar is a resident of California. Jarrar was and is an "employer" of Jone Doe, and/or an "aider" and/or "abettor," under all applicable statutes.

FACTUAL ALLEGATIONS

I. INTEL’S DECADES-LONG RELIANCE ON ISRAEL AND THE ISRAELI PEOPLE

34. Intel creates world-changing technology that enriches the lives of nearly every person on Earth in some capacity. This multinational technology company is one of the world’s leading manufacturers of central processing units and semiconductors. Indeed, Intel creates the crucial components of almost every electronic device essential to the modern world.

35. To say that Intel’s trajectory has been upward would be an understatement. Over and over, Intel has been ranked in the Fortune 500 list of the largest United States corporations by revenue. Most recently, its full-year revenue for 2023 was \$54.2 billion. Without question, Intel is a juggernaut in the field of cutting-edge technology and has cemented its spot as a world leader.

36. Intel’s success, however, was hard-fought by the pioneers who laid the groundwork and put in the hours and propelled it to success – many of whom were Israeli and Jewish.

37. Intel was founded in 1968 by Robert Noyce and Gordon Moore. However, Noyce and Moore did not build the company alone; they were joined by Grove, a Hungary-born Jewish man, from the very first day Intel was incorporated. Grove joined Intel as its first Director of Engineering – in fact, he was Intel’s first official employee.

38. Grove’s life is well publicized considering its valor and success. Indeed, as a child, Grove survived Nazi occupation and escaped Communist-controlled Hungary at the age of 20.

39. Once in America, he earned his education and became the man who is widely credited for transforming Intel from a memory chip manufacturer into one of the world's top microprocessor producers.

40. In 1969, Frohman, an Israeli-Jewish electrical engineer, joined Intel. Like Grove, Frohman's success did not come easy. Frohman, having lost his parents in the Holocaust, spent several years of his childhood in Jewish orphanages before he was adopted by relatives in Israel. From that point on, Frohman grew up in Tel Aviv, Israel and proudly served in the Israeli army prior to starting his advanced education.

41. Just one year after joining Intel, and two years after the company was founded, Frohman developed the concept for the erasable programmable read-only memory ("EPROM"). The EPROM business remained one of Intel's most profitable products well into the 1980s and laid the groundwork for flash memory.

42. Then, in 1974, "Intel Israel" was founded in Haifa, Israel, as Intel's first development center outside of the U.S. Intel's Haifa location worked on products critical to Intel's future, including key components of what would become the Pentium microprocessor.

43. In 1985, after learning first-hand how lucrative its dealings with Israel were, Intel doubled down on the partnership and opened its first fabrication facility outside of the U.S.A., known as Fab 8. This time, the facility was constructed in Jerusalem, Israel. By the early 1990s, Fab 8 was responsible for about three-quarters of the global output of the 386 microprocessor, at the time Intel's best-selling product.

44. Also in 1985, Frohman, who had a hand in negotiating on behalf of Intel for a plant in Jerusalem, was named the General Manager of Intel Israel. In his role, Frohman

managed the Fab 8 through the first Gulf War and kept it running as Scud missiles rained down on Israel.

45. Given that it was making money hand over fist from its partnerships with Israel and the Israeli people, in 1996, Intel built a \$2.4 billion facility in Kiryat Gat, Israel. The Israeli government contributed \$600 million toward the effort.

46. In 1997, Grove was named *Time* magazine's Man of the Year. The magazine's treatment of Grove was especially laudatory – it not only portrayed him, Intel and their joint contributions favorably, but also conveyed that the impact of Grove's contributions extended far beyond the calendar year of 1997.

47. In 2005, after a nearly decade-long successful run in Kiryat Gat, Israel, Intel announced a \$3.5 billion complementary facility in Kiryat Gat, Israel.

48. In 2010, Intel designed its first green building in Haifa, Israel. Intel's Design Center in Haifa was designed to conform to the Leadership in Energy and Environmental Design Green Building Rating System, a voluntary standard for developing high-performance, sustainable buildings.

49. Then, in 2017, Israel became home to Intel's Autonomous Driving Group, after the company acquired Mobileye, an Israel-based company that specialized in autonomous driving technology.

50. Two years later, in 2019, Intel unveiled an 800,000 square-foot, 11-story development center in Petah Tikvah, Israel called PTK1. Intel's leaders labeled PTK1 "the smartest building in the world."

51. Intel's investments in Israel – and vice versa – did not end there. In 2021, Intel began building a new manufacturing center in Kiryat Gat, Israel at an estimated cost of \$10

billion. At the time, Gelsinger said that Intel's continued investments in the country "promise a vibrant future for Intel and Israel for decades to come."

52. Without a shadow of a doubt, Intel's investments in Israel have paid off handsomely for Intel. Indeed, in 2022, Intel Israel was responsible for \$8.7 billion in exports and its operations accounted for 5.5% of Israel's high-tech exports and 1.75% of the country's gross domestic product.

53. In 2023, the aforementioned \$10 billion manufacturing center in Kiryat Gat, Israel began operating. That same year, Intel announced its largest investment in Israel to date – a \$25 billion factory in Kiryat Gat, Israel. Toward the historic effort, the Israeli government agreed to provide Intel with a \$3.2 billion grant.

54. Presently, Intel's long-standing relationship with Israel is more cemented than ever – this year, 2024, marking half a century since Intel Israel was founded. Intel's investments in Israel cannot be understated.

55. As of 2024, Intel has more than 10,000 employees that make up the powerhouse that is Intel Israel. To this point, to date, Intel has invested more than \$50 billion into its operations in Israel, a figure – given Intel and Israel's rich history – that is sure to grow.

56. More than investing in its economy, Intel has also invested in Israeli communities. Indeed, Intel engineers teach over 30 courses at Israeli universities.

57. Intel's relationship with Israel goes far beyond that of a common, arms-length partnership. Indeed, Intel's foundation, and much of its early success, was built off the backs of Grove and Frohman, two Jewish engineers. Indeed, because of the ingenuity of Jewish engineers, Intel was able to become the juggernaut that it is.

58. Intel was the company that had succeeded on the backs of Jewish and Israeli employees, from two Jewish immigrants to over 10,000 employees today, as well as because of the significant investments that Israel has made in Intel.

II. JOHN DOE'S BACKGROUND

59. John Doe is a Jewish Israeli citizen who proudly served with the Israel Defense Forces ("IDF"). His parents and siblings continue to live in Israel.

60. John Doe graduated from a highly selective and competitive school in the IDF and received an honors degree.

61. After attending the IDF school, John Doe worked in cybersecurity for the IDF.

62. Then, after concluding his army service, John Doe began working at an international technology company where he was responsible for leading the design and development of enterprise solutions for major banks.

63. John Doe then became an employee of an Israeli data storage company where he managed all pre-sales and sales activities; developed and finalized technical solutions in collaboration with the engineering team; and provided strategic advice on IT infrastructure, cloud solutions and security.

64. Thereafter, John Doe was recruited to become an Engineering Leader by an Israeli Startup that improved processor engines.

65. John Doe's contributions helped develop the Startup into a company with a large customer base and more than \$8 million in Annual Recurring Revenue ("ARR") – an incredible success story for what started as a small startup.

66. As a result of his significant achievements at the Startup, John Doe was asked to relocate to New York City on an L-1 visa¹ to establish and build the Startup's U.S. market presence. It was a formidable task, but one that John Doe was excited to take on.

III. INTEL ACQUIRES THE STARTUP AND JOHN DOE CONTINUES TO BE A TOP PERFORMER

67. Just one month after John Doe moved to the United States to establish the Startup's U.S. market presence, Intel acquired the company.

68. At the time of the acquisition, John Doe was named as one of the top ten key performers. As a result, Intel awarded him a significant retention bonus to be paid out over a four-year period in recognition of the importance of his work and to convince him to stay with Intel after the acquisition.

69. John Doe agreed to the retention bonus and began working for Intel as an Engineering Lead.

70. At that time, the Startup was integrated into Intel's Data Center & Artificial Intelligence Group ("DCAI"). John Doe received a retention bonus letter stating that his work in DCAI counted toward his vesting.

71. The Startup was then moved to be part of the Software and Advanced Technology Group ("SATG"), and John Doe received an amended letter stating that his work in SATG counted toward the vesting of his retention bonus.

¹ "The L-1A nonimmigrant classification enables a U.S. employer to transfer an executive or manager from one of its affiliated foreign offices to one of its offices in the United States. This classification also enables a foreign company that does not yet have an affiliated U.S. office to send an executive or manager to the United States with the purpose of establishing one." See <https://www.uscis.gov/working-in-the-united-states/temporary-workers/l-1a-intracompany-transferee-executive-or-manager>.

72. For the first year of his employment, everything ran smoothly. John Doe reported directly to the Startup's former Chief Operating Officer. The former Chief Operating Officer in turn, reported to the Startup's Former CEO.

73. Shortly thereafter, Intel reorganized and the Startup's business functions were moved to the Sales and Marketing ("SMG") organization. Once again, John Doe received an amended letter stating that his work for SMG would count toward the vesting of his retention bonus.

74. As a result of the reorganization, John Doe began working under the Startup's former Chief Revenue Officer. His division was consistently named a top performer.

75. John Doe continued to receive excellent performance reviews. For example, in recognition of his "exceeds expectations" performance rating in the Fall of 2023, he was elevated to a Band 86 level within the SMG organization.

76. Thereafter, John Doe was promoted to become the Vice President of Engineering. Simultaneous with his promotion, John Doe received a substantial compensation increase.

IV. AFTER HAMAS'S OCTOBER 7, 2023 ATTACK ON ISRAEL, INTEL VICE PRESIDENT, ALAA BADR CELEBRATES THE DEATH OF ISRAELIS

77. As the Vice President of Customer Success at Intel, Badr, an Egyptian Muslim, is in charge of a diverse team of employees from all nationalities, ethnicities and faiths.

78. Prior to October 7, 2023 attack on Israel, Badr publicly portrayed himself as someone dedicated to bridging divides, bringing community together, and advocating for cross-cultural competence between Muslims and non-Muslims.

79. Badr spoke publicly about the importance of supporting Muslims in the workplace by urging employers to show compassion towards Muslim employees when fellow

Muslims around the world are targeted by tragic events and discriminatory practices. As Badr said, “all these events have a deep effect on your employee. Part of being an amazing leader is to face it, break it down and discuss it.”²

80. He has also spoken prolifically at public events to dispel myths about Muslims and talk about the importance of taking care of your neighbors.³

81. Given these public declarations of the importance of understanding others, Badr appeared on paper as the perfect manager for a diverse group of employees.

82. On October 7, 2023, Hamas, a terrorist group, unleashed an assault of startling brutality and breadth upon Israel. As Israeli citizens were preparing for bed, Hamas gunmen attacked numerous Israeli communities and showed no mercy. Indeed, Hamas gunmen murdered children, women, the elderly and anyone else they saw, without pause or remorse. No one was safe and women were indiscriminately and openly raped. The torture of Israeli citizens was publicly celebrated. The modern world had never witnessed an attack of that caliber in live time. If they were not murdered, hundreds of Israeli citizens were taken captive. Even to the present day, numerous Israeli citizens, if they remain living, are still captive to Hamas.

83. Israel responded in a steadfast pursuit to eradicate the terrorist group that caused such indiscriminate torture.

84. For its part, Intel purported to stand with Israel. In November 2023, Intel provided its Israeli employees a \$5,000 wartime grant. In December 2023, Gelsinger stated: “For almost 50 years, we were the first company to start the tech nation there. I was just on the

² See <https://www.forbes.com/sites/rebekahbastian/2019/07/17/five-tips-for-supporting-muslims-in-the-workplace/>.

³ See <https://www.valleyrecord.com/news/muslim-community-reaches-out-find-support-from-snoqualmie-valley-neighbors/>.

phone, yesterday, with Isaac Herzog, the president of the country. This is a resilient people. We will support them. We believe so deeply in what they've done.” As it would turn out, this was mere lip service.

85. For his part, Badr did not even bother with lip service and, shortly after the October 7, 2023 invasion, Badr’s carefully crafted persona quickly fell apart because he was unable to hide his disturbing and hate-filled beliefs about Israelis.

86. Indeed, while publicly preaching peace and the importance of understanding differences in both life and in the workplace, Badr began openly showing his support for the terrorist organization Hamas and the destruction of Israel. To be clear, Badr did not simply sympathize with the plight of innocent Gazans stuck in the middle of Hamas and Israel. Rather, he openly advocated for and celebrated the murder of Israelis like John Doe and the members of his family.

87. In early December 2023, Badr liked a tweet celebrating the death of IDF soldiers. This entire tweet says the following: “At dawn today, the Qassam fighters were able to monitor the positioning of dozens of occupation soldiers (60 soldiers) inside tents at their positioning point east of Juhr al-Deek...[s]o the fighters planted 3 anti-personnel bombs in a circular pattern around the position, and at exactly 4:30 the bombs were detonated among the occupation soldiers. One of the fighters advanced to finish off the remaining members of the force, and the fighters withdrew to their positions safely **after killing a large number of occupation soldiers**” (emphasis added).⁴

⁴ In addition to liking anti-Israeli social media posts, Badr was also indiscriminate about those he supported online. Indeed, Hinkle is a known antisemitic propagandist. According to *The New York Times*, Hinkle “has cultivated an online persona so incendiary that he has been kicked off YouTube, Twitch and Instagram.” He developed such a large audience through “employ[ing] false or misleading content, promot[ing] manipulated images and mak[ing]



88. At the end of December 2023, presumably in response to 15 IDF soldiers being killed on December 23-24 in Gaza, Badr again liked several tweets praising the Hamas Qassam Brigade – the military arm of Hamas – for killing or harming Israeli soldiers.

comments that watchdog organizations have denounced as antisemitic.” See <https://www.nytimes.com/2024/04/11/business/media/jackson-hinkle-israel-gaza-misinformation.html>. In an analysis of Hinkle’s content performed by the Centre for Countering Digital Hate, it was found that since October 7th, Hinkle “repeatedly posted misleading claims about the war,” including “false claims that an image alleged to be of a child killed by Hamas was generated by AI” and “images that he claim[ed] [were] from Gaza, when in fact they were taken in Syria.” See https://counterhate.com/wp-content/uploads/2024/04/Hate-Pays_April2024_CCDH_FINAL.pdf.

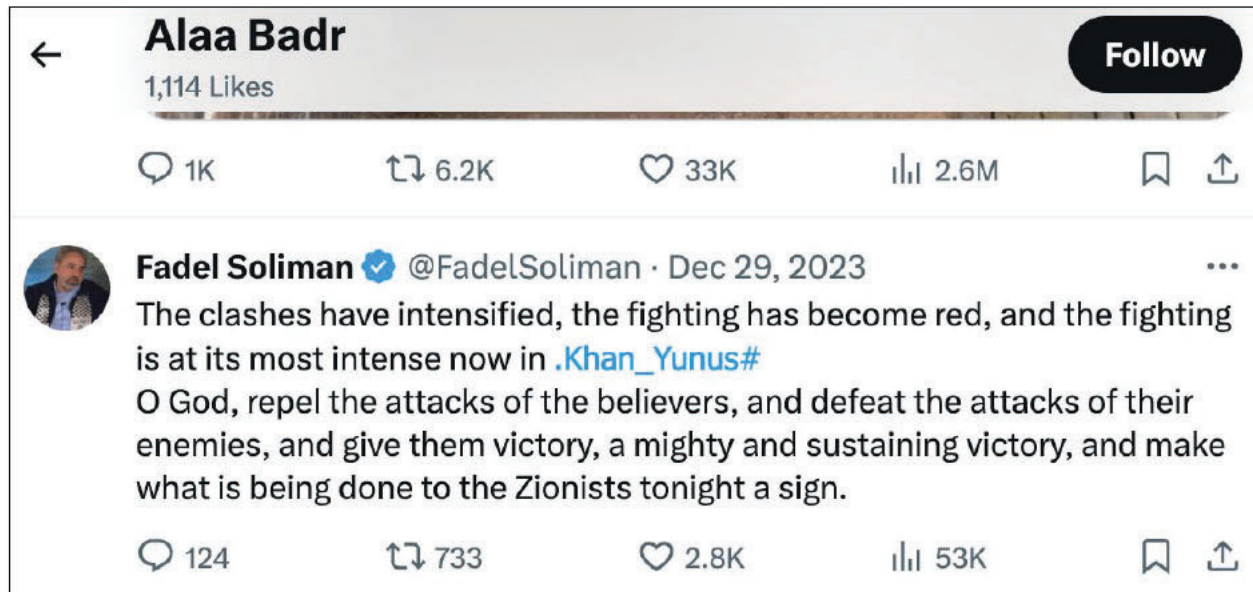
89. For example, Badr liked a graphic image showing the foot of a Hamas soldier on the neck of an Israeli soldier with his/her face shoved into sand/dirt, an image of an Israeli soldier being strangled by hands with word “Gaza” inscribed on them and an image of IDF soldiers being surrounded by tanks with a machine gun being pointed at them. To be clear, these images alone plainly show that Badr – an Intel Vice President who worked with Israeli and Jews – openly and proudly supported a terrorist organization and called for the death of Israelis.







90. On December 29, 2023 after a series of rocket attacks across northern Israel, Badr liked a tweet praising “what is being done to the Zionists,” which meant, of course, attempts to kill or the actual killing of Israelis.⁵



91. However, not content to simply support hateful rhetoric about the death of Israeli soldiers, Badr also publicly liked tweets and images that went so far as to *celebrate the bombing and burning* of IDF soldiers, while also claiming they would be “sent to hell.”

92. It is hard to imagine the depth of hatred Badr holds for Israelis when he made the decision to like callous tweets celebrating the burning of Israeli soldiers that ended with stomach-churning burn emojis.


⁵ Fadel Soliman became well known for encouraging violence against women during a campus speaking tour in 2016 when it was reported that during the tour he encouraged students to watch a set of videos where he “advises physical punishment for wives who have displeased their husbands, saying ‘the hitting must be done with a small stick’” in addition to outlining the Islamic case for sex slavery and polygamy. See https://www.dailymail.co.uk/news/article-3391194/Speaker-tells-students-s-fine-hit-wife-doesn-t-string-extremists-touring-British-universitiesunchallenged.html?utm_source=Honest+Reporting+Canada&utm_campaign=00fa159465EMAIL_CAMPAIGN_2023_01_01_06_22_COPY_01&utm_medium=email&utm_term=0-c2395b4f14-%5BLIST_EMAIL_ID%5D.

←

Alaa Badr

1,114 Likes

Follow




1.4K

38K

116K

2.4M




Aging ✓ @1b2_r · Dec 22, 2023

Replying to @Abu_Salah9

[Al-Qassam Brigades#](#) : Bombing a building in which 5 Zionist soldiers were holed up and they were sent to hell. 🔥 ▼

...



From **Aging** ✓

10

80

921

237K



93. Badr's hateful social media presence continued well into January 2024 when he liked tweets presumably celebrating Hamas' January 22, 2024 military attacks on Israelis, which was referred to then as the deadliest day for the IDF after 24 IDF soldiers were killed.



94. In addition to his hatred for Israel, Badr also displayed a growing anti-American sentiment as a result of the U.S. government's support of Israel. In one image, Badr liked a tweet claiming that President Biden supported and paid for Israel bombing hospitals. In another image that Badr liked, the Arabic roughly translates to: "the American people are waking from their coma; the American people understand" and chastises America's "moral decadence."

←

Alaa Badr

1,114 Likes

Follow

▶

0:05 / 2:03

🔊

⚙️

📌

↗️

💬 326

↻ 3.8K

❤️ 9.4K

📊 732K

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📤



Jackson Hinkle 🇺🇸

🔒 @jacksonhinklle · Dec 23, 2023

...



💬 1.4K

↻ 38K

❤️ 116K

📊 2.4M

🔖

📤

← **Alaa Badr**
1,114 Likes
477 1.1K 5.9K 352K

Freedom of hope @Amal12341990 · Jan 28

▼ The American people are waking up !
to the Biden government, which supports wars terribly from the pocket of the American citizen, and they are waking up to a Russian slap that struck Texas, which represents the beating heart of America's natural resources, especially oil. America, with its moral decadence and opening multiple war fronts at the same time... has marked the end of a unilateral regime...

[Show more](#)



0:57

124 2K 6K 749K

95. In a tweet and sentiment widely shared in anti-Israel media, there were several reports that released Israeli hostages later praised their treatment by Hamas while held in captivity. Despite the horrors of captivity being widely discussed by multiple released hostages, Badr liked a tweet that said “Israeli prisoners love[d] the Hamas fighters who imprisoned them,” quoting an even more offensive tweet that claimed the released hostage had the “smile of a lover, not the smile of fearful shame.”⁶



⁶ Considering that the United Nations found clear and convincing evidence that Israeli hostages were raped by Hamas, claiming that a hostage had the “smile of a lover” is so far beyond the pale that it is barbaric.

96. While the underlying facts are true – Israeli prisoner Yocheved Lifshitz, an 85-year-old peace activist – did shake the hand of one of her captors, she also publicly stated that she “went through hell” once she was in the safety of a Tel Aviv hospital.

97. To say or support the notion that any prisoner “loved” his/her captor is not only deeply offensive to the victims but simply untrue. Badr’s support of such a narrative speaks only to his inability to recognize the trauma Lifshitz suffered after being taken captive and further displays Badr’s dehumanization of Israelis.

98. During the same time Badr was publicly spreading this misinformation, tragedy struck John Doe’s family in Israel when he nearly lost his entire family to a missile strike by Hamas. Indeed, John Doe’s family home was struck by a Hamas missile with his family still inside. John Doe’s immediate family members were all injured in the attack and they had to evacuate their home.

99. Intel was well aware that John Doe’s family was victimized by the rocket attack, as John Doe immediately told a Human Resources personnel for the Startup who was now working at Intel, in addition to several other co-workers.

100. The dichotomy of John Doe’s family being attacked and injured in Israel while Badr publicly liked tweets celebrating the deaths of Israelis is shameful. The fact that Badr was allowed to continue working at Intel while spreading such hateful rhetoric calling for the death of Israelis is deeply disturbing.

V. BADR BECOMES JOHN DOE’S DIRECT SUPERVISOR DESPITE PUBLICLY CELEBRATING THE DEATH OF ISRAELIS

101. Whispers about Badr’s support for the death and destruction of Israel and its people began spreading amongst a group of Intel employees in the Fall of 2023.

102. When those rumors first surfaced, John Doe did not work with Badr but was deeply concerned about the Israeli and Jewish employees who had to work alongside him.

103. As if Intel's blind eye to Badr's true nature was not disturbing enough, on January 29, 2024 John Doe was suddenly notified that Badr had become his new direct manager. John Doe would be the only Israeli reporting directly to Badr.

104. John Doe was deeply distraught at the thought of reporting to a man who openly supported the murder of Israelis and Jews. While he would have been upset regardless of whether his family remained in Israel, it is hard to emphasize enough the true despair John Doe felt knowing he was expected to report to a man who was celebrating the murders of Israelis – like his family members – at the hands of Hamas.

105. John Doe immediately communicated with the Former CEO of the Startup to express his distress about reporting to Badr. He told the Former CEO that given Badr's opinions about Israelis and the IDF specifically, he knew Badr would fire him as soon as he could.

106. The Former CEO agreed to file an official complaint on behalf of John Doe and the other employees who would be within Badr's new reporting structure.

107. After John Doe asked an employee in Intel's Human Resources department to file an official complaint against Badr. The employee was hesitant to do so, likely based on her own fears of retaliation. As such, the Former CEO filed the complaint himself. In the complaint, the Former CEO included a compilation of screenshots that showed Badr supporting Hamas and the murder of Israelis and Jews. He specifically stated that he was "report[ing] a concern with regards to an employee being hostile towards Israel and Israelis."

108. The Former CEO, while not naming John Doe directly, said that Badr had an Israeli employee assigned to him (John Doe was the only Israeli reporting to Badr) and reiterated that it would be “immoral and harmful to let [Badr] lead Israelis.”

109. In the complaint, the Former CEO also asked that Jarrar, the Vice President of Business Sales and Badr’s manager, be notified about the complaint.

110. Despite the very serious nature of the complaint, Intel did not respond, and John Doe continued reporting to Badr.

VI. BADR CONTINUES HIS UNABATED ONSLAUGHT OF DISCRIMINATORY CONDUCT

111. John Doe quickly realized that Badr’s hostility and hatred toward Israelis was not just confined to his online behavior, and that the carefully crafted image Badr developed was fully fabricated.

112. Despite the great personal cost, John Doe showed up to work at Intel every day and put his best foot forward. Badr, however, was dead set on making John Doe’s professional life as intolerable as possible because of his Jewish and Israeli heritage.

113. John Doe maintained the utmost professional decorum, but Badr’s attitude toward him was frigid and isolating. It was as if Badr loathed the concept of even speaking to John Doe, so he simply did not. Indeed, despite being John Doe’s direct manager, Badr almost never communicated with him.

114. When he did communicate with John Doe, Badr pressured John Doe to tell him whether other Intel employees were Israeli and when John Doe confirmed that specific employees were Israeli, Badr sneered that there were “so many Israeli employees in our company.” It was as if Badr wanted to know exactly who he should despise based on their nationality.

115. Badr, despite being a high-level employee, would resort to school-yard bully tactics when it came to managing John Doe. For instance, Badr would refuse to approve the totally valid expense reports of John Doe's direct reports in an effort to assert dominance over the group, and John Doe in particular.

116. Badr would also regularly interrupt and undermine John Doe during team meetings. It was obvious that Badr wanted everyone at Intel to respect John Doe as little as he did, going out of his way to ensure that John Doe got very little time to provide the team with updates on his projects.

117. Badr would even go so far as undermining John Doe to his direct reports. Indeed, Badr would, in contravention of Intel's customary chain of commands, directly engage with John Doe's direct reports on various tasks.

118. John Doe reported Badr's discriminatory conduct to the Former CEO who assured him that the situation was being dealt with and would be investigated by Diana Egusa ("Egusa").

119. In February 2024, John Doe alerted the Former CEO that his family home had been made inhabitable by a Hamas missile and that his family had all been injured in the attack. John Doe also informed the Former CEO that, simultaneous with the attack on his family home, Badr had publicly liked tweets cheering for a successful attack in Israel. John Doe also provided the Former CEO with photos of his destroyed family home. The Former CEO assured John Doe that Egusa would be made aware of Badr's abhorrent conduct.

120. The Former CEO was finally interviewed by Egusa on February 22, 2024. Four days later, John Doe received a notification that Badr had viewed his LinkedIn profile, which clearly states that John Doe served in the IDF. This caused John Doe additional indescribable

distress – he was already on the receiving end of Badr’s ire and now, Badr confirmed that John Doe was exactly what he (Badr) publicly wished death upon, an IDF soldier.

121. Moreover, it was clear to John Doe that Badr was well aware that John Doe was the underlying cause of the Company’s investigation. After all, John Doe was the only Israeli reporting directly to Badr and it was known at Intel that it was John Doe’s family home that was hit in the Hamas missile strike which he shared with the Former CEO who was interviewed by Egusa mere days prior.

122. By March 2024, however, Badr disbanded his Twitter account that was painted with vitriol towards Israelis and IDF soldiers. This indicated to John Doe that it was possible Intel actually spoke to Badr about his complaint. John Doe could not know for sure, however, because Intel never bothered to interview John Doe in connection with the complaint despite assurances from the Former CEO that he would be interviewed by Egusa.

123. Ever the optimist despite his abhorrent treatment, John Doe sincerely hoped that Intel was finally taking his complaint seriously and that it would replace Badr as his manager so that he could work peacefully in an environment free from blatant discrimination.

VII. INTEL TERMINATES JOHN DOE WEEKS AFTER BADR DISCOVERS THAT JOHN DOE IS AN IDF VETERAN

124. On April 2, 2024, one month after Badr discovered that John Doe served in the IDF, John Doe was “laid-off.”

125. John Doe was completely stunned by the news of his dismissal. He had been one of Intel’s most diligent employees and, by all metrics, was wildly successful in his role. Yet, he found himself without a job. John Doe knew the real reason he was terminated which were the facts that he was an Israeli and made complaints (through the Former CEO) about Badr’s unlawful discriminatory animus.

126. John Doe reported his layoff to the Former CEO who was completely shocked to learn that John Doe had been let go. After all, John Doe was one of Intel's top employees. The Former CEO immediately instructed John Doe to seek legal counsel and said that he (John Doe) had been the victim of discrimination and retaliation.

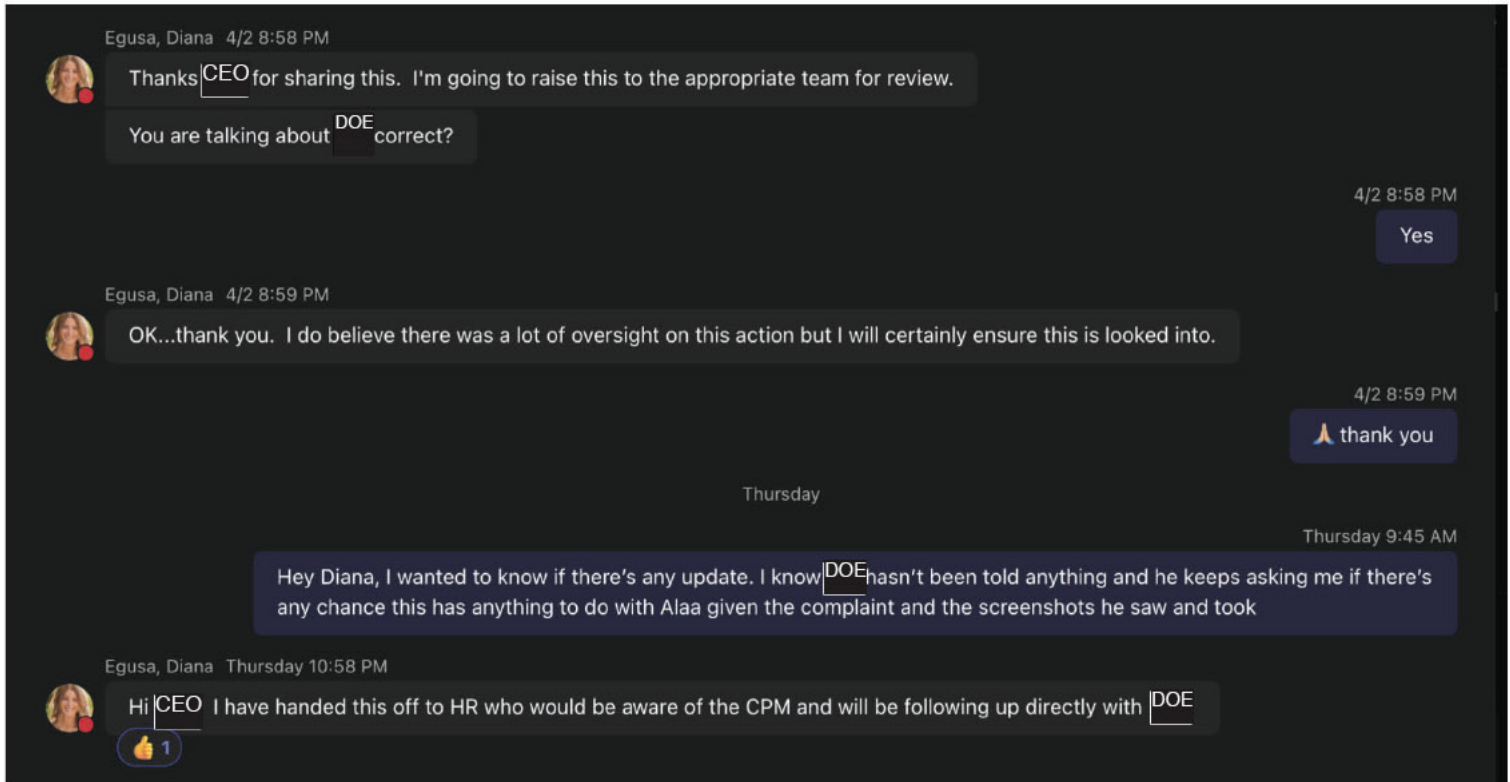
127. The same day that John Doe was dismissed, the Former CEO updated his complaint – filed on behalf of John Doe – and wrote, *inter alia*:

In the beginning of February I filed a complaint against Alaa [B]adr based on data I was given by Israelis who were going to report to him. 22 screenshots of likes on X (formerly twitter) calling for the death and killing of Israelis and Israeli soldiers. These employees were actively, and some still are, in reserve duty and fighting in the Swords of Iron war. They were not confident that Alaa can be unbiased regarding his views, and felt it's a hostile work environment to be reporting to someone publicly calling for your death and the death of your family and loved ones.

2 months after the complaint has been filed, there was a CPM in SMG which very suspiciously in Alaa's team, included all of the Israeli rolling up to him. It might be said that he had no active part in the decision, and that at the last minute only one was impacted (following conversations between Markus and Abdul). But as Alaa was the one who was supposed to explain how valuable their work is/was and convey their impact to Abdul in order to avoid this decision in the first place, **it's very hard to believe the decision was completely unbiased**. Especially, as it was ultimately reversed, proving just how valuable the Israelis really are to the business.

The same team that brought me the information in the first place, now told me they see what happened/almost happened as complete retaliation and a full on hostile work environment to continue to work with him, not to mention roll up to him. They feel like instead of defending them against someone publicly calling for their deaths, Intel forced them to work for him and ultimately entrusted their fate in him, causing them to almost lose their jobs, not based on merit but retaliation for the complaint and full on hatred.

128. The Former CEO also sent an email message to the investigator, Egusa, in connection with John Doe's dismissal:



129. Indeed, Egusa admits that Intel was aware of the Former CEO's complaint that John Doe had been unlawfully terminated. Nevertheless, Intel took no corrective action against Badr and continued to allow him to oversee Israeli employees and have their professional fates in his hands.

130. After John Doe's unlawful termination, the Former CEO asked his boss, Marcus Firler ("Firler"), to create a new position for John Doe in a different organization. He argued that not only did Intel make a huge mistake in terminating John Doe, but he was also their best employee.

131. Clearly recognizing that his termination was unlawful, Intel then created a new job for John Doe. The position had never existed before it was suddenly created for John Doe.

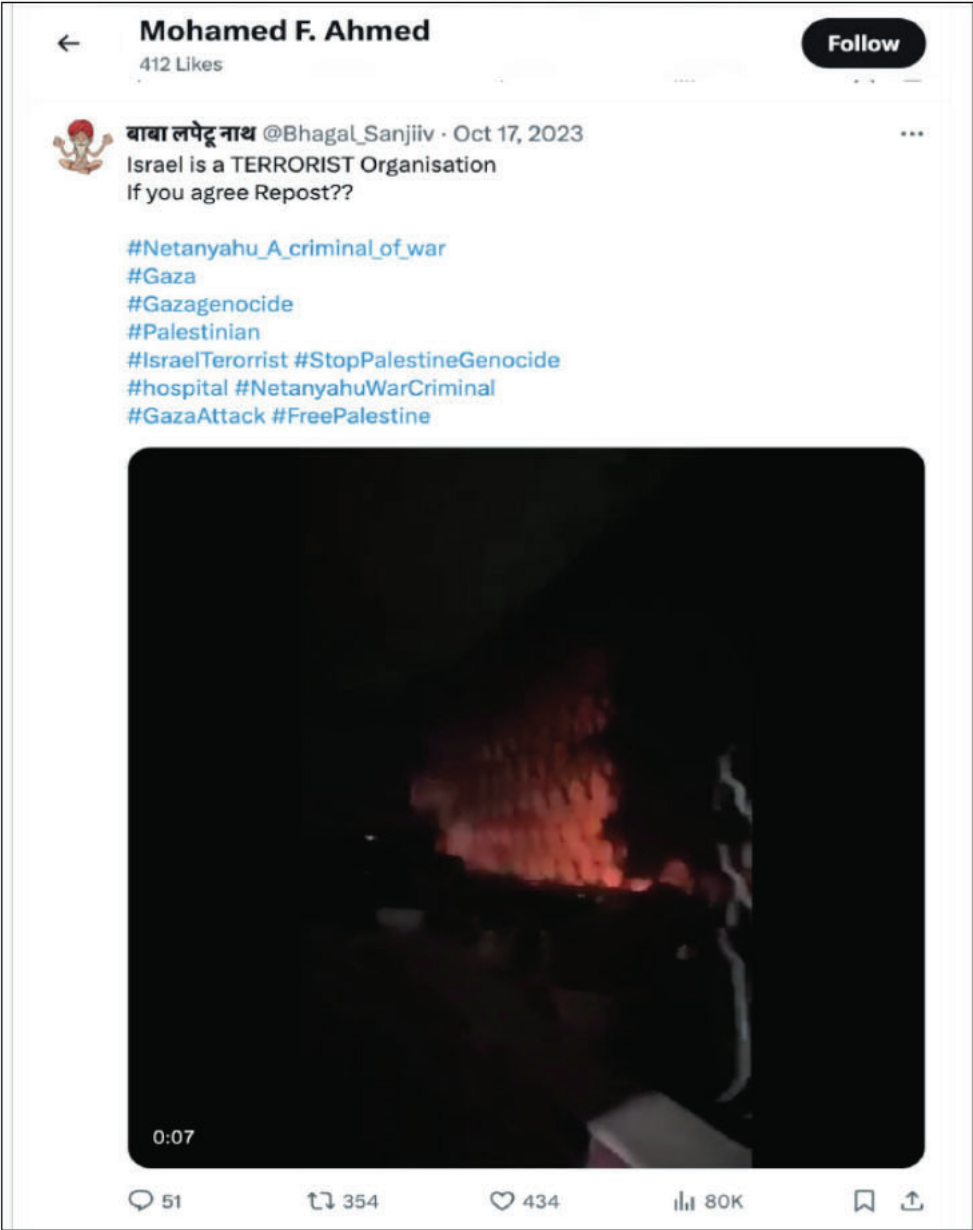
132. On May 20, 2024, the Former CEO confirmed that John Doe could be placed in the newly created role, but that it would come with a significant pay cut. John Doe confirmed that despite the pay cut, his retention bonus would remain in place.

133. Barely pretending that John Doe's layoff was legitimate, just weeks after he was laid off for "cost cutting measures" and forced to take a lower-paying position, Badr replaced him with a new employee, Ahmed, who shared the same anti-Israel sentiments as Badr.

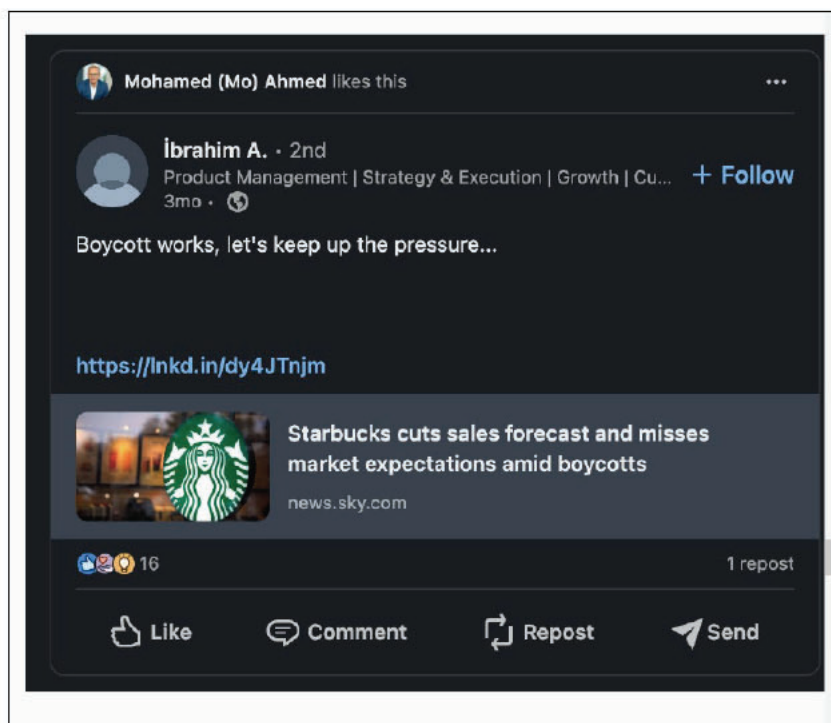
134. Like Badr, Ahmed had a fondness for sharing hateful and discriminatory tweets about Israelis. In late October 2023, Ahmed presumably posted his support for Hamas when he wrote that God supplies equipment to fight Israel.



135. Ahmed was also fond of reposting social media posts to show his belief that Israel is a terrorist state, liking posts implying pro-Israel positions are lies and promoting boycotts of companies for supporting Israel (which is particularly ironic given his employment at a company that quite literally was built on the backs of Jews and Israelis).







136. In a further act of retaliation, on July 3, 2024 Human Resources suddenly informed John Doe that his retention bonus was being cancelled.

137. Intel was clearly continuing to harass, demoralize and retaliate against John Doe in an effort to push him out of the company again.

138. John Doe objected, showing written approvals and promises from the Former CEO and pointed out that his amendment letter plainly states that his new job counts toward vesting.

139. Despite that evidence, Intel upheld its decision to strip away John Doe's retention bonus. John Doe – who had only ever given his all to Intel – was being punished for protesting discrimination.

140. Intel does nothing to protect its Israeli employees. John Doe, an Israeli IDF veteran, was made to report to a man that would celebrate the death of his community, the death of his family, and, frankly, the death of John Doe. Day after day, John Doe was made to

swallow his pride and hold his tongue while being openly denigrated, even when his boss celebrated a missile strike that nearly killed his family. John Doe did what he was supposed to do: he complained over and over but no one at Intel stepped in. Intel left John Doe's fate to a man that publicly condemned everything that he is. Even after Intel unlawfully terminated John Doe, it did not even grant him the courtesy of upholding its promise to honor his retention bonus.

141. Intel likes to tout its lucrative relationship with Israel and cash in on its investment, but make no mistake: Intel does not concern itself with the wellbeing of its Israeli employees.

FIRST CAUSE OF ACTION
(Discrimination in Violation of Section 1981)

142. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in each of the preceding paragraphs, as though fully set forth herein.

143. Defendants discriminated against Plaintiff on basis of his race and ethnicity in violation of Section 1981 by, *inter alia*, terminating his employment, revoking his retention bonus and substantially reducing his compensation, as well as by requiring him to report someone who would have celebrated his death and the death of his family members.

144. Defendants discriminated against Plaintiff on the basis of his race and ethnicity in violation of Section 1981 by fostering, condoning, accepting, ratifying and/or otherwise failing to prevent or to remedy a hostile work environment that has included, among other things, frequent, severe and pervasive discrimination and harassment.

145. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of Section 1981, Plaintiff has suffered, and continues to suffer, monetary and/or economic harm, for which he is entitled to an award of damages.

146. As a direct and proximate result of Defendants' unlawful discriminatory conduct and harassment in violation of Section 1981, Plaintiff has suffered, and continues to suffer, mental anguish and emotional distress, including but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence and emotional pain and suffering, for which he is entitled to an award of damages and other relief.

147. Defendants' unlawful and discriminatory actions constitute malicious, willful and wanton violations of Section 1981, for which Plaintiff is entitled to an award of punitive damages.

SECOND CAUSE OF ACTION
(Retaliation in Violation of Section 1981)

148. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in each of the preceding paragraphs, as though fully set forth herein.

149. Defendants retaliated against Plaintiff by, *inter alia*, terminating his employment, revoking his retention bonus and substantially reducing his compensation, as well as by requiring him to report someone who would have celebrated his death and the death of his family members.

150. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of Section 1981, Plaintiff has suffered, and continues to suffer, monetary and/or economic harm, for which he is entitled to an award of damages.

151. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of Section 1981, Plaintiff has suffered, and continues to suffer, mental anguish and emotional distress, including but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence and emotional pain and suffering, for which he is entitled to an award of damages.

152. Defendants' unlawful and retaliatory actions constitute malicious, willful and wanton violations of Section 1981, for which Plaintiff is entitled to an award of punitive damages.

THIRD CAUSE OF ACTION
(Discrimination in Violation of the NYSHRL)

153. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in each of the preceding paragraphs, as though fully set forth herein.

154. Defendants discriminated against Plaintiff on the basis of his race, ethnicity, religion and national origin in violation of the NYSHRL by, *inter alia*, terminating his employment, revoking his retention bonus and substantially reducing his compensation, as well as by requiring him to report someone who would have celebrated his death and the death of his family members.

155. Defendants discriminated against Plaintiff on the basis of his race, ethnicity, religion and national origin in violation of the NYSHRL by fostering, condoning, accepting, ratifying and/or otherwise failing to prevent or to remedy a hostile work environment that has included, among other things, frequent, severe and pervasive discrimination and harassment.

156. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic harm, for which he is entitled to an award of damages.

157. As a direct and proximate result of Defendants' unlawful discriminatory conduct and harassment in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, mental anguish and emotional distress, including but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence and emotional pain and suffering, for which he is entitled to an award of damages and other relief.

158. Defendants' unlawful and discriminatory actions constitute malicious, willful and wanton violations of the NYSHRL, for which Plaintiff is entitled to an award of punitive damages.

FOURTH CAUSE OF ACTION
(Retaliation in Violation of the NYSHRL)

159. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in each of the preceding paragraphs, as though fully set forth herein.

160. Defendants retaliated against Plaintiff by, *inter alia*, terminating his employment, revoking his retention bonus and substantially reducing his compensation, as well as by requiring him to report someone who would have celebrated his death and the death of his family members.

161. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic harm, for which he is entitled to an award of damages.

162. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of the NYSHRL, Plaintiff has suffered, and continues to suffer, mental anguish and emotional distress, including but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence and emotional pain and suffering, for which he is entitled to an award of damages.

163. Defendants' unlawful and retaliatory actions constitute malicious, willful and wanton violations of the NYSHRL, for which Plaintiff is entitled to an award of punitive damages.

FIFTH CAUSE OF ACTION
(Discrimination in Violation of the NYCHRL)

164. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in each of the preceding paragraphs, as though fully set forth herein.

165. Defendants discriminated against Plaintiff on the basis of his race, ethnicity, religion and national origin in violation of the NYCHRL by, *inter alia*, terminating his employment, revoking his retention bonus and substantially reducing his compensation, as well as by requiring him to report someone who would have celebrated his death and the death of his family members.

166. Defendants discriminated against Plaintiff on the basis of his race, ethnicity, religion and national origin in violation of the NYCHRL by fostering, condoning, accepting, ratifying and/or otherwise failing to prevent or to remedy a hostile work environment that has included, among other things, frequent, severe and pervasive discrimination and harassment.

167. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic harm, for which he is entitled to an award of damages.

168. As a direct and proximate result of Defendants' unlawful discriminatory conduct and harassment in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, mental anguish and emotional distress, including but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence and emotional pain and suffering, for which he is entitled to an award of damages and other relief.

169. Defendants' unlawful and discriminatory actions constitute malicious, willful, and wanton violations of the NYCHRL, for which Plaintiff is entitled to an award of punitive damages.

SIXTH CAUSE OF ACTION
(Retaliation in Violation of the NYCHRL)

170. Plaintiff hereby repeats, reiterates and re-alleges each and every allegation in each of the preceding paragraphs, as though fully set forth herein.

171. Defendants retaliated against Plaintiff by, *inter alia*, terminating his employment, revoking his retention bonus and substantially reducing his compensation, as well as by requiring him to report someone who would have celebrated his death and the death of his family members.

172. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, monetary and/or economic harm, for which he is entitled to an award of damages.

173. As a direct and proximate result of Defendants' unlawful retaliatory conduct in violation of the NYCHRL, Plaintiff has suffered, and continues to suffer, mental anguish and emotional distress, including but not limited to, depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem and self-confidence and emotional pain and suffering, for which he is entitled to an award of damages.

174. Defendants' unlawful and retaliatory actions constitute malicious, willful and wanton violations of the NYCHRL, for which Plaintiff is entitled to an award of punitive damages.

PRAYER FOR RELIEF

WHEREFORE, John Doe prays that the Court enters judgment in his favor and against Defendants for the following relief:

- A. A declaratory judgment that the actions of Defendants complained of herein violate the laws of the United States, the State of New York and City of New York;
- B. An injunction and order permanently restraining Defendants from engaging in such unlawful conduct;
- C. An award of damages against Defendants, in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for all monetary and/or economic damages, including but not limited to past and future lost earnings;
- D. An award of damages against Defendants, in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for all non-monetary and/or compensatory damages, including but not limited to emotional pain and suffering and emotional distress;
- E. An award of damages against Defendants, in an amount to be determined at trial, plus prejudgment interest, to compensate Plaintiff for harm to his professional and personal reputations and loss of career fulfillment;
- F. An award of punitive damages in an amount to be determined at trial;
- G. Prejudgment interest on all amounts due;
- H. Reinstatement;
- I. Front pay;
- J. An award of attorneys' fees and costs that Plaintiff has incurred in this action to the fullest extent permitted by law; and
- K. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: August 13, 2024
New York, New York

Respectfully submitted,

WIGDOR LLP

By: _____



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